

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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DANIEL BLACK,

Plaintiff,

v.

Civil Action No. 2:17-cv-00156

DAVID A. CLARKE, JR.,

Defendant.

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**PLAINTIFF'S REQUEST FOR ADDITION AND DELETION  
OF PROPOSED *VOIR DIRE* QUESTIONS**

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Plaintiff, by this attorney Anne T. Sulton of Sulton Law Offices, hereby respectfully requests this honorable Court consider asking the following questions of prospective jurors, and as appropriate, follow up questions should any of the responses be in the affirmative.

The bases for this request are: a) the Court's order at docket # 60 denying Defendant's motion to permit use of juror questionnaire; and b) many thousands of comments about this case have been posted on many national and local news media websites by their audiences, and on Face Book, Twitter and other social media internet sites.

1. Have you seen any news media stories published about this case?
2. Did you post and/or read any comments to any of the news media stories about this case on the websites of any news media outlet?
3. Do you use Face Book, Twitter and/or other social media internet sites to communicate – send and/or receive – information?

4. Did you read any of the Face Book, Twitter and/or other social media posts about this case?

5. Were you among the people sending and/or receiving Face Book, Twitter and/or other social media posts about this case?

6. Were you among the people participating in the marches and/or other protests against the Defendant?

7. Have you ever filed a complaint against any government office or government official?

Given the Court's statement that it intends to try this case in only one day, Plaintiff also respectfully requests that the following previously proposed *voir dire* questions, filed at docket # 59, **not** be asked: 1, 2, 3, 4, 13, 16, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33. Some of these questions are clearly inappropriate, e.g., we should not ask prospective jurors questions touching upon or exploring their religious beliefs or asking them to publicly disclose their confidential health information.

Respectfully submitted this 18<sup>th</sup> day of January, 2018.

**s/Anne T. Sulton**  
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## CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2018, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Wisconsin by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

**s/Anne T. Sulton**

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